

NOSB ITEM FOR PUBLIC COMMENT

The National Organic Standards Board (NOSB) is seeking public comment on recommendations regarding its “Livestock Committee Recommendation for Guidance on Pasture Requirements.” Comments will be accepted until the end of the public input session during the NOSB meeting on August 15, 2005. With respect to receipt of comments by the NOSB during the comment period, the following provisions have been established to ensure that your comment has the greatest probability of being received and reviewed by the Board:

- Mail: Persons may submit comments on listed Board recommendations by mail to: The National Organic Standards Board; c/o Arthur Neal; Room 4008 - South Building; 1400 and Independence Avenue, SW; Washington, D.C. 20250-0001.
- E-mail: Comments may be sent via internet to NOSB.Livestock@usda.gov.
- Fax: Comments may be submitted by fax to (202) 205-7808.

Clearly indicate if you are for or against the Board recommendation or some part of it and why. Include recommended wording changes as appropriate. Include a copy of articles or other references that support your comments. Only relevant material should be submitted.

**NOSB Livestock Committee Recommendation for Guidance on
Pasture Requirements for the National Organic Program
July 12, 2005**

Introduction

The USDA National Organic Program (NOP) has requested NOSB provide guidance concerning the pasture requirements of the National Organic Program that the NOP can review and distribute to accredited certifying agents and post on the NOP website. The NOSB reviewed the proposed guidance from the Livestock Committee at the March, 2005 meeting, and made several changes. The NOSB then requested additional public comments on the revised guidance.

The NOSB Livestock Committee received and reviewed comments on the revised guidance. The Livestock Committee has revised the guidance to include several of the comments, including clarification of the meaning of growing season, clarification of the role of the NRCS standards, and certain grammatical issues. A minority opinion on the Livestock Committee sought the inclusion of the word “approximate” in relation to the percentage of DMI to reflect the annualized aspect of the Organic System Plan, however this opinion was not adopted by the Committee. The Livestock Committee will present this guidance to the NOSB at the August meeting and request that the NOSB recommend this guidance to the NOP. The Livestock Committee believes that the guidance, combined with the rule changes recommended at the March 2005 meeting with regard to stage of life and lactation are sufficient, and no further rule changes are recommended at this time.

Guidance for interpretation of §205.239(a)(2)

A. Organic System Plan

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. *The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on an average daily basis during the growing season but not less than 120 days.* Growing season means the time of year of pasture growth from natural precipitation or manual irrigation practices. The Organic System Plan shall include a timeline showing how the producer *will satisfy the goal to maximize* the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan shall describe: 1) the amount of pasture provided per animal; 2) the average amount of time that animals are grazed on a daily basis; 3) the portion of the total feed requirement that will be provided from pasture; 4) circumstances under which animals will be temporarily confined; and 5) the records that are maintained to demonstrate compliance with pasture requirements.

B. Temporary Confinement

Temporary confinement means the period of time when ruminant livestock are denied pasture. The length of temporary confinement will vary according to the conditions on which it is based (such as the duration of inclement weather) and instances of temporary confinement shall be the minimum time necessary. In no case shall temporary confinement be allowed as a continuous production system. All instances of temporary confinement shall be documented in the Organic System Plan and in records maintained by the operation.

Temporary confinement is allowed only in the following situations:

- 1) During periods of inclement weather such as severe weather occurring over a period of a few days during the grazing season;
- 2) Conditions under which the health, safety, or well being of an individual animal could be jeopardized, including to restore the health of an individual animal or to prevent the spread of disease from an infected animal to other animals; or
- 3) To protect soil or water quality

C) Appropriate Pasture Conditions

As a tool for the farmer and the certifier, appropriate pasture conditions can be determined by referring to the regional Natural Resources Conservation Service Conservation Practice Standards for Prescribed Grazing (Code 528) for the number of animals in the Organic Systems Plan.

Approved by the Livestock Committee July 12, 2005

5 Yes

0 No

0 Abstain